

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Carlton Carter

Case No. Case: 2:22-mj-30205
Assigned To : Unassigned
Assign. Date : 4/29/2022
Description: CMP USA v. CARTER
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 24, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 29, 2022

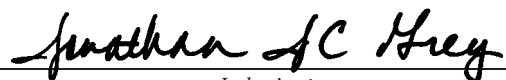
City and state: Detroit, Michigan



Complainant's signature

Jaclyn Kocis-Maniaci, Task Force Officer (ATF)

Printed name and title



Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigation involving firearms and narcotics laws resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Carlton CARTER (DOB xx/xx/1993) has violated Title 18, United States Code, Section 922(g)(1), Felon in Possession of a

Firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On April 24, 2022, Detroit Police Department (DPD) officers observed a dark Jeep driving, slam on their breaks abruptly with no traffic in front of them and at great distance from the intersection. The officers also observed, through their driver's side mirror, the Jeep stopped at a red light. When the light turned green, the Jeep accelerated at a high rate of speed. DPD officers attempted to catch up to the Jeep traveling at speeds approximately 60 mph.

5. A traffic investigation was conducted. Upon approaching the vehicle, officer's observed the passenger, later identified as Carlton CARTER, lean forward as to be stuffing or attempting to conceal contraband. The driver, K.H., was asked to produce a valid driver's license, registration, and insurance. K.H. provided the officers with a Michigan Identification card, but nothing else that was requested. Both occupants were asked to step outside of the vehicle.

6. As the DPD officers were checking the passenger side of the vehicle where they observed CARTER leaning, officers recovered a

handgun underneath the front passenger seat of the Jeep. CARTER fled on foot, unprovoked flight. After a short foot chase, officers detained CARTER. CARTER was arrested for Carrying a Concealed Weapon (CCW). A Smith and Wesson, model XD-40, 40 caliber handgun, serial number #XD527751 was recovered and placed in evidence.

7. On April 25, 2022, a computerized criminal history check showed that CARTER has the following felony convictions:

- a. 2014- weapons, firearm, discharge in or at a building, Michigan;
- b. 2017- controlled substance-possession, Michigan;
- c. 2018-larceny in a building, Michigan;
- d. 2020-narcotics-possession, West Virginia.

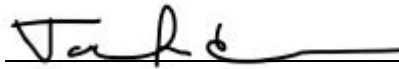
8. On April 27, 2022, Special Agent Joshua McClean advised me, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

9. CARTER has a federal conviction out of the Southern District of West Virginia, for possession with intent to distribute controlled substances. He was sentenced to 37 months in federal prison, followed by three years' supervised release, in October 2020. Meaning, CARTER knew he had been convicted of a felony offense prior to possession of the firearm described above.

III. CONCLUSION

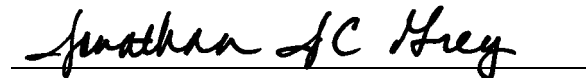
10. Probable cause exists that Carlton CARTER, knowing that he was a convicted felon, did knowingly possess a firearm, that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
Presence and/or by reliable electronic means.



Hon. Jonathan J.C. Grey
United States Magistrate Judge

Date: April 29, 2022